

Exhibit 16
(Previously Filed Under Seal as Dkt. 317-3)



May 23, 2019

VIA ECF

Honorable David T. Schultz
United States District Court
9E U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Allen Hinderaker
Heather Kliebenstein
Michael A. Erbele
MERCHANT & GOULD P.C.
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2215

Re: Fair Isaac Corp. v. Federal Insurance Co., et al.
No. 16-cv-01054-WMW-DTS (D. Minn. Filed April 21, 2016)

Dear Judge Schultz and Counsel:

Pursuant to the Court's May 8 Order, Federal has been ordered to "determine whether, when, and how the requested information can be extracted and produced and at what cost" regarding FICO's Request for Production of Documents No. 90. Federal reports that currently there are no tools/utilities to extract Blaze Advisor rules from the repository and convert them into a human readable format. However, Federal has two options:

1. Federal can use the Blaze Advisor native utility to generate a Structured Rules Language ("SRL") code, which would take a several weeks to complete for all repositories across the enterprise, at a cost of approximately \$10,000. The output of this utility is a file for each ruleset, which requires an extensive and technical understanding of the Blaze Advisor software. In addition, this information is highly-confidential and commercially and competitively sensitive information.
2. Federal can go through the code and document the rules manually, i.e., rules harvesting. The Middle Market team has approximately 2,000 rules and they estimate this will take them about 20 weeks to complete. This is based on real data. Using this information, Federal estimates and assumes, given the fact it has about 26,000 rules to convert across the enterprise, that it will take about 260 weeks (about 10,400 hours) to complete the extraction. The rough order of magnitude estimate for this extraction would be approximately \$500,000. This information is also highly-confidential and commercially and competitively sensitive information.



VIA ECF
Page 2

Please let us know if the Court requires any additional information.

Best regards,

A handwritten signature in black ink, appearing to read 'C. Pham', with a long horizontal flourish extending to the right.

Christopher D. Pham
Direct Dial: 612.492.7388
Email: cpham@fredlaw.com